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November 15, 2023

Via ECF

MEMO ENDORSED

Hon. Sidney H. Stein United States District Judge United States District Court Southern District of New York 500 Pearl Street New York, NY 10007

Re: Frangie Espinal, On Behalf of Herself and All Other Persons Similarly Situated v. Viking River Cruises, Inc.

Case No. 23-cv-8110 (SHS)

Request to Adjourn Initial Pleading Deadline and Status Conference (On Consent)

Dear Judge Stein:

We represent the Defendant, Viking River Cruises, Inc. ("Defendant"), in the above-referenced action.

Pursuant to Rule 1.E. of Your Honor's Individual Practices, we write to respectfully request an initial extension of time of 30 days to answer, move or otherwise respond to the Complaint, from November 20, 2023, to and including December 20, 2023. In addition, we write to respectfully request that the Initial Pretrial Conference ("Conference") currently scheduled for November 29, 2023 (Doc. No. 6) be adjourned to some date at the Court's convenience after January 2, 2024.

Good cause exists for the requested extension and adjournment because Defendant is in the process of reviewing and investigating the Plaintiff's claims relating to Defendants' website accessibility, at which point the Parties will need to meet and confer pursuant to the Court's rules in advance of the anticipated Conference.

This is the Defendant's first request for an adjournment of the Conference and extension of the pleading deadline. This request does not affect any other dates. Plaintiff consents to this request.

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We thank the Court for its consideration in this matter.

Respectfully submitted,

Ian T. Clarke-Fisher

cc: All Counsel of Record (via ECF)

The last day for defendant to respond to the complaint is extended to December 20, 2023. The initial pretrial conference is adjourned to January 11, 2024, at 12:00 p.m.

Dated: New York, New York November 16, 2023

SO ORDERED:

Sidney H. Stein, U.S.D.J.